

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

ALFA LIFE INSURANCE CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	Case No. CV-05-775-C
)	
ADVANTAGE CONSULTING GROUP, INC.,)	
and RICHARD E. KNUTSON,)	
)	
Defendants.)	

ADVANTAGE CONSULTING GROUP, INC.,)
)
Third-party Plaintiff,)
)
v.)
)
EDS SOLCORP,)
)
Third-party Defendant)

JOINT MOTION TO EXTEND DEADLINES FOR EXPERT WITNESS REPORTS

All parties to this action jointly move the Court to modify the scheduling order to extend the deadlines for expert reports as requested herein. As grounds for this motion, the parties jointly state as follows:

1. This case is currently set for trial during the Court's November 26, 2007 trial term. The pretrial conference in this action is currently set for October 15, 2007.
2. The deadline for completing discovery is currently set for July 1, 2007.
3. The deadline for Plaintiff's expert reports is currently set for January 31, 2007, and the deadline for both Defendants' and Third-Party Defendant's expert reports is March 31, 2007.

4. This case involves a large number of documents dealing with highly sophisticated computer technologies. All parties have been diligent in the voluminous responses to written discovery requests and have scheduled deposition dates for key witnesses.

5. Continuance of the deadline for expert reports and modifying the scheduling order according to the following proposed schedule will not prejudice any party and will serve the interests of justice by (1) allowing all parties to choose an expert according to the developing testimony of the fact witnesses; (2) allowing the parties' experts sufficient time to prepare their expert reports; and (3) allowing Defendants and Third-Party Defendants sufficient time to respond to the other parties' expert witness reports.

WHEREFORE, the parties jointly move that the deadlines for expert reports in this case be reset as follows:

- (1) That the deadline for Plaintiff's expert witness reports be reset for May 1, 2007;
- (2) That the deadline for Defendants' expert witness reports be reset for June 1, 2007;
- (3) That the deadline for Third-Party Defendant's expert witness reports be reset for July 1, 2007;
- (4) That all discovery be completed on or before August 1, 2007.

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